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OCT 30 10 59 AM '01

BENTON HARBOR, MICHIGAN 49022

October 30, 2001

Mr. Thomas F. Maxwell, III
Report Analyst
Reports Analysis Division
Federal Election Commission
999 E Street, NW
Washington, D.C. 20463

Dear Mr. Maxwell,

We are in receipt of your letter dated October 17, 2001 (L.D. No. C00039040). We received it on October 22, 2001.

You identified two contributions to Senator Spencer Abraham's 2000 reelection campaign that collectively exceeded the maximum allowable contribution limits for a general election by \$1,000.

This was an unintentional mistake by our Whirlpool Corporation Political Action Committee and it will not occur again.

Prior to your discovery of our mistake, we ordered GNOSOSS software (and training for that software) that will catch such future mistakes before our PAC issues any future campaign contribution checks. In other words, the corrective action against future similar errors was being implemented prior to receipt of your letter. The software has been installed and we will complete our software training within the next 30 days.

The Whirlpool Corporation PAC has been in existence since the mid-1970s. You will also see from your records that we are a relatively small PAC. Whirlpool Corporation PAC filed our first electronic report July 26, 2001 (2001 Mid-Year Report) in anticipation of reaching the \$50,000 threshold. We also have limited staff for administering FEC requirements. We have always been extremely sensitive to the Commission's compliance requirements. Given the fact that there were four years between the \$1,000 contribution and the \$5,000 contribution we simply forgot about the earlier contribution when making the later contribution.

We have asked for the \$1,000 from Secretary Abraham back to our Whirlpool Corporation PAC and will promptly provide you with Secretary Abraham's responding actions/correspondence. We accept responsibility for our mistake.

Respectfully,

Michael C. Thompson

Michael C. Thompson
Director, Government Relations

Attachment: Abraham Letter

cc: Deborah K. Jones



Administrative Center

BENTON HARBOR, MICHIGAN 49022

October 30, 2001

The Honorable Spencer Abraham
Secretary of Energy
U.S. Department of Energy
Forrestal Building
1000 Independence Avenue, SW
Washington, D.C. 20585

Dear Mr. Secretary,

We are in receipt of a letter from the Federal Election Commission (attached) dated October 17, 2001 that identified an inadvertently excessive contribution by the Whirlpool Corporation Political Action Committee to your year 2000 election cycle.

On April 29, 1996 we contributed \$1,000 to your general election run for the U.S. Senate.

On October 27, 2000, realizing the closeness of your race we contributed \$5,000 to your year 2000 general election race.

We mistakenly overlooked the \$1,000 contributed four years earlier, and by so doing exceeded the maximum allowable contribution to a general election cycle by the \$1,000 amount.

The Commission is directing that we request a refund from you back to our Whirlpool Corporation Political Action Committee "of the amount in excess of \$5,000" (i.e., \$1,000). My mailing address is:

Michael C. Thompson
Whirlpool Corporation Political Action Committee
2000 M 63 (3005)
Benton Harbor, MI 49022

We apologize to you for this mistake. We thank you for your distinguished tenure in the U.S. Senate.

Respectfully,

A handwritten signature in cursive script that reads "Michael C. Thompson".

Michael C. Thompson
Director, Government Relations

Attachments:

- FEC Letter
- Whirlpool Corporation PAC Reports

cc: Kathy Govan

Federal Election Commission

**ENVELOPE REPLACEMENT PAGE
FOR INCOMING DOCUMENTS**

The Commission has added this page to the end of this filing to indicate how it was received.

<input checked="checked" type="checkbox"/> Hand Delivered	Date of Receipt <i>10-30-01</i>
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<input type="checkbox"/> Postmark Illegible	
<input type="checkbox"/> Received from the House office of Records and Registration	Date of Receipt
<input type="checkbox"/> Received from the Senate Office of Public Records	Date of Receipt
<input type="checkbox"/> Other (Specify):	Postmarked and/or Date of Receipt
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(6/2000)